

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

v.

KURBANOV, *et al.*,

Defendants.

Case No. 1:18-cv-00957-CMH-TCB

**PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37**

Pursuant to Federal Rule of Civil Procedure 37, Plaintiffs respectfully move this Court for an order entering default judgment against Defendant Tofig Kurbanov. As set forth in the accompanying memorandum, Defendant has refused to comply with this Court's discovery orders and to appear for his deposition, is withholding information that is directly relevant to the central claims and defenses in this case, and is refusing to cooperate further in this litigation. Defendant's conduct warrants the sanction of a default judgment. Accordingly, Plaintiffs respectfully request that the Court: (1) enter a default judgment against Defendant; and (2) set a briefing schedule on damages, a permanent injunction, and attorneys' fees.

Dated August 4, 2021

/s/ Scott A. Zebrak

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